

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MARYLEBONE PCC LIMITED—ROSE 2
FUND on behalf of itself and all similarly
situated persons,

Plaintiff,

vs.

MILLENNIUM GLOBAL INVESTMENTS,
LTD.; MILLENNIUM ASSET
MANAGEMENT, LTD.; MICHAEL R.
BALBOA; GLOBEOP FINANCIAL
SERVICES, LTD.; GLOBEOP FINANCIAL
SERVICES LLC; SS&C TECHNOLOGIES,
INC.; BCP SECURITIES LLC and XYZ
CORP.

Defendants.

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC # _____
DATE FILED: 1-3-13

Case No. 1:12-CV-03835-PAC

**STIPULATION AND ~~PROPOSED~~ ORDER EXTENDING TIME FOR NON-
SETTLING DEFENDANTS TO OBJECT OR OTHERWISE RESPOND TO
PLAINTIFF'S MOTION FOR PRELIMINARY APPROVAL OF SETTLEMENT WITH
DEFENDANT BCP SECURITIES LLC**

WHEREAS Plaintiff Marylebone PCC Limited – Rose 2 Fund filed a Motion for Preliminary Approval of Settlement with Defendant BCP Securities LLC on December 20, 2012 (the “Motion”);

WHEREAS the current deadline for Defendants to respond to the Motion under Local Rule 6.1(b) and Rule 6(d) of the Federal Rules of Civil Procedure is January 7, 2013;

WHEREAS Defendants Millennium Global Investments Limited, Millennium Asset Management Limited, GlobeOp Financial Services LLC, GlobeOp Financial Services Ltd., and

SS&C Technologies, Inc. (collectively, the "Non-Settling Defendants")¹ are evaluating whether to object or otherwise respond to the Motion;

WHEREAS counsel for Plaintiff consents to extending the deadline for the Non-Settling Defendants to object or otherwise respond to the Motion until January 17, 2013;

WHEREAS this is the Non-Settling Defendants' first request for adjournment of the time to respond to the Motion;

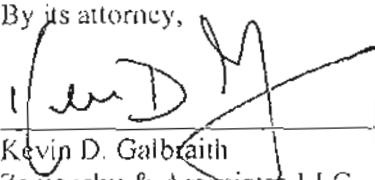
IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned parties:

(1) That the Non-Settling Defendants shall have up to and including January 17, 2013 to object or otherwise respond to the Motion.

Dated: December 21, 2012

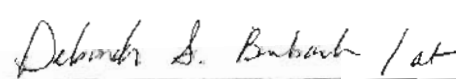
MARYLEBONE PCC LIMITED
- ROSE 2 FUND

By its attorney,


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MILLENNIUM GLOBAL INVESTMENTS
LIMITED, MILLENNIUM ASSET
MANAGEMENT LIMITED

By their attorneys,


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¹ Non-Settling Defendant Michael Balboa is not a party to this stipulation.

GLOBEOP FINANCIAL SERVICES LLC,
GLOBEOP FINANCIAL SERVICES LTD.,
SS&C TECHNOLOGIES, INC.

By their attorney,

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SO ORDERED, this 31 day of January, ~~2012~~ ²⁰¹³ A.

Paul A. Crotty

The Honorable Paul A. Crotty
United States District Judge

GOODWIN | PROCTER

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December 21, 2012

VIA E-MAIL (CROTTYNYSDCHAMBERS@NYSD.USCOURTS.GOV)

The Honorable Paul A. Crotty
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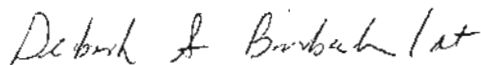
**Re: *Marylebone PCC Limited – Rose 2 Fund v. Millennium Global Investments Ltd., et al.*,
Civil Action No. 12-CV-3835 (PAC) – Non-Settling Defendants’ Request for
Extension**

Dear Judge Crotty:

We represent Defendants Millennium Global Investments Limited (“MGIL”) and Millennium Asset Management Limited (“MAML”) in the above-referenced action. On behalf of MGIL, MAML, GlobeOp Financial Services LLC, GlobeOp Financial Services Ltd., and SS&C Technologies, Inc. (collectively, the “Non-Settling Defendants”), enclosed for submission and signature please find a Stipulation and Order Extending Time for Non-Settling Defendants to Object or Otherwise Respond to Plaintiff Motion for Preliminary Approval of Settlement with Defendant BCP Securities LLC (the “Motion”).

Plaintiff filed the Motion on December 20, 2012, and the current deadline for the Non-Settling Defendants to respond, under Local Rule 6.1(b) and Rule 6(d) of the Federal Rules of Civil Procedure, is January 7, 2013. The Non-Settling Defendants are evaluating whether to object or otherwise respond to the Motion, and respectfully request to extend the deadline to January 17, 2013. Plaintiff consents to this requested extension. This is the first extension sought by the Non-Settling Defendants.

Respectfully submitted,



Deborah S. Birnbach

Enclosure

GOODWIN | PROCTER

The Honorable Paul A. Crotty

December 21, 2012

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